

Randall L. Seaver, Trustee  
PO Box 1167  
Burnsville, MN 55337

Invoice Date: March 20, 2025  
Invoice Number: 822332  
Matter Number: 66549.000029  
Billing Attorney: MRB  
Client #: 66549

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*Summary of Professional Services as of **February 28, 2025***

**Client:** Randall L. Seaver, Trustee  
**Matter:** Clinton Curtis Lugert

Total Fees	\$	38,539.00
Total Disbursements	\$	<u>787.98</u>
Total Due This Invoice	\$	<u><u>39,326.98</u></u>

**Please Remit to:**

*Moss & Barnett  
Attn: Accounting  
150 South Fifth Street, Suite 1200  
Minneapolis, MN 55402  
Phone: 612-877-5000  
Federal Tax ID:*  
**(Please reference the Invoice Number on your remittance.)**

EXHIBIT B
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**Time Detail**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/19/23	Burton, Matthew R.	Telephone call with client and review Lugert records.	0.30	525.00	157.50
12/20/23	Burton, Matthew R.	Work on objection to homestead exemption.	1.00	525.00	525.00
12/21/23	Burton, Matthew R.	Review file and initiate process to get 1st meeting audio; email to client regarding odd transactions.	1.10	525.00	577.50
12/21/23	Kasheimer, Brandi J.	Prepare motion exempting to claimed exemption.	1.50	180.00	270.00
12/22/23	Burton, Matthew R.	Review new documents.	0.20	525.00	105.00
12/26/23	Burton, Matthew R.	Analyze debtor's records for avoidance purposes and correspond with client regarding the same.	0.60	525.00	315.00
12/28/23	Burton, Matthew R.	Review motion objecting to claimed exemption and telephone call with client.	0.50	525.00	262.50
01/20/24	Seaver, Randall L.	Work on motion to compel.	1.00	550.00	550.00
01/22/24	Kasheimer, Brandi J.	Prepare motion to compel debtor to file complete and accurate schedules; prepare exhibits.	2.50	180.00	450.00
01/22/24	Burton, Matthew R.	Review and edit motion regarding schedules including review of schedules.	0.70	525.00	367.50
01/22/24	Kasheimer, Brandi J.	Review 341 meeting audio.	0.60	180.00	108.00
01/22/24	Seaver, Randall L.	Revisions to motion.	1.50	550.00	825.00
01/23/24	Kasheimer, Brandi J.	Review client emails and apply revisions to motion to compel; pull relevant bank account statements and email to client; finalize motion; file motion with bky court and serve (x3).	0.40	180.00	72.00
01/23/24	Seaver, Randall L.	Final revision to motions.	1.30	550.00	715.00
01/24/24	Kasheimer, Brandi J.	Emails wit UST's office; upload debtor documents to secure portal.	0.10	180.00	18.00
01/24/24	Kasheimer, Brandi J.	Correspond with Veritext to request 341 meeting transcript; submit audio and meeting details to Veritext via their secure portal.	0.20	180.00	36.00
01/26/24	Burton, Matthew R.	Review amended schedules.	0.10	525.00	52.50
01/29/24	Burton, Matthew R.	Telephone call with client; review 1st meeting transcript; consider motion objecting to homestead exemption; work on Rule 2004 motion	1.00	525.00	525.00

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01/29/24	Kasheimer, Brandi J.	Prepare rule 2004 motion.	1.00	180.00	180.00
01/30/24	Burton, Matthew R.	Telephone call with client.	0.10	525.00	52.50
01/30/24	Burton, Matthew R.	Work on 2004 motion.	0.20	525.00	105.00
02/02/24	Muth, Rainey C.	Research the rules on how to effectively serve process on the United States Postal Service, and prepare email correspondence regarding the same.	0.50	300.00	150.00
02/02/24	Kasheimer, Brandi J.	Prepare turnover motion of documents from USPS and Anytime Mailbox; search proper service addresses.	2.40	180.00	432.00
02/02/24	Burton, Matthew R.	Telephone call with client; review 2004 motion and direct turnover motion.	1.00	525.00	525.00
02/03/24	Seaver, Randall L.	Review turnover motion.	0.20	550.00	110.00
02/05/24	Kasheimer, Brandi J.	Apply final edits to 2004 motion; finalize/file/serve motion.	0.60	180.00	108.00
02/06/24	Kasheimer, Brandi J.	Finalize turnover motion and file with bky court; prepare service letters and serve (x7).	0.60	180.00	108.00
02/07/24	Kasheimer, Brandi J.	Call with Violetta Crooks re motion for examination of entities.	0.20	180.00	36.00
02/12/24	Kasheimer, Brandi J.	Email to UST requesting audio of second 341 meeting; review audio upon receipt; email to client.	0.50	180.00	90.00
02/12/24	Kasheimer, Brandi J.	Email to Veritext requesting transcript of second 341 meeting; upload audio and supporting documents to secure portal.	0.20	180.00	36.00
02/16/24	Burton, Matthew R.	Initial review of 341 transcript.	0.20	525.00	105.00
02/18/24	Seaver, Randall L.	Review transcript and work on supplement.	1.00	550.00	550.00
02/19/24	Burton, Matthew R.	Review client notes regarding second motion; edit supplemental response.	0.30	525.00	157.50
02/19/24	Kasheimer, Brandi J.	Review client email and prepare a supplemental memorandum re motion to compel; prepare exhibits; email to court re filing event limitations.	0.90	180.00	162.00
02/20/24	Burton, Matthew R.	Draft turnover motion for deposit.	0.40	525.00	210.00
02/20/24	Kasheimer, Brandi J.	Follow up email to court; finalize memorandum in support of motion to compel; file with bky court; serve (x4)	0.30	180.00	54.00
02/20/24	Kasheimer, Brandi J.	Prepare turnover motion re residential lease deposit; fwd to client.	0.50	180.00	90.00

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02/23/24	Kasheimer, Brandi J.	Review returned mail as to turnover motion directed to USPS; call to USPS to obtain accurate address for Postmaster Johnson; prepare service letter and reserve turnover motion.	0.30	180.00	54.00
02/27/24	Kasheimer, Brandi J.	Prepare revised order re turnover motion.	0.20	180.00	36.00
02/28/24	Kasheimer, Brandi J.	Prepare letter to Realty ONE Group Choice re Mpls rent payments; email to client for review; mail.	0.40	180.00	72.00
02/28/24	Burton, Matthew R.	Review and edit letter to One Group.	0.20	525.00	105.00
02/28/24	Seaver, Randall L.	Draft demand letter for rents.	0.20	550.00	110.00
03/04/24	Burton, Matthew R.	Telephone call with client and research homestead issues.	1.00	525.00	525.00
03/05/24	Burton, Matthew R.	Work on homestead exemption and telephone call with client.	0.60	525.00	315.00
03/05/24	Kasheimer, Brandi J.	Prepare motion for examination of USPS; send to client for review.	1.30	180.00	234.00
03/05/24	Reinarz, Donna M.	Discuss project with B. Kasheimer; obtain certificate of title and copy of notice.	0.20	180.00	36.00
03/19/24	Kasheimer, Brandi J.	Review correspondence from USPS regarding turnover motion; review file for rule 2004 motion status; email to client regarding same.	0.30	180.00	54.00
03/19/24	Burton, Matthew R.	Review UST complaint and email to client.	0.10	525.00	52.50
03/29/24	Burton, Matthew R.	Work on exemption objection.	1.00	525.00	525.00
04/01/24	Burton, Matthew R.	Review final version of motion.	0.10	525.00	52.50
04/01/24	Seaver, Randall L.	Review and correlate documents and information re leases.	1.10	550.00	605.00
04/02/24	Kasheimer, Brandi J.	Review lease documents and Capital One check records; redline draft motion for turnover and email to MRB for review.	0.70	180.00	126.00
04/03/24	Burton, Matthew R.	Work on exemption objections.	2.40	525.00	1,260.00
04/03/24	Kasheimer, Brandi J.	Work on memorandum for motion objecting to claimed exemption.	1.50	180.00	270.00
04/03/24	Busch, Kevin M.	Examine issues related to homestead exemption claim.	0.20	720.00	144.00
04/03/24	Seaver, Randall L.	Review payments and receipts for recoveries and objection. Work on objections.	4.00	550.00	2,200.00
04/04/24	Kasheimer, Brandi J.	Continue working on motion objecting to claimed exemptions.	1.00	180.00	180.00

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04/04/24	Burton, Matthew R.	Telephone call with client X 2; review motion documents.	0.60	525.00	315.00
04/04/24	Seaver, Randall L.	Work on objections.	3.50	550.00	1,925.00
04/05/24	Burton, Matthew R.	Work on exemption objections/motion.	2.50	525.00	1,312.50
04/05/24	Seaver, Randall L.	Objection Revisions.	3.80	550.00	2,090.00
04/06/24	Seaver, Randall L.	Revisions to objections.	0.80	550.00	440.00
04/07/24	Seaver, Randall L.	Revisions to moving documents.	2.00	550.00	1,100.00
04/08/24	Seaver, Randall L.	Memo revisions.	1.00	550.00	550.00
04/08/24	Burton, Matthew R.	Edits to Memo and Notice.	0.40	525.00	210.00
04/09/24	Kasheimer, Brandi J.	Finalize motion objecting to claimed exemptions and file with bky court; prepare service letter and serve (x4).	0.50	180.00	90.00
04/17/24	Burton, Matthew R.	Telephone call with client regarding case status; review motion response and legal research on adequacy of response.	0.50	525.00	262.50
04/19/24	Muth, Rainey C.	Research case law discussing the requirements for a proper response to a motion objecting to claimed exemptions for purposes of preparing Trustee's response to the same.	1.10	300.00	330.00
04/19/24	Burton, Matthew R.	Consider reply to Lugert response.	0.30	525.00	157.50
04/22/24	Burton, Matthew R.	Preparation for motion.	0.80	525.00	420.00
04/22/24	Muth, Rainey C.	Research Minnesota/8th Circuit case law for the burden shifting requirements regarding claims of exemptions for purposes of preparing Trustee's response to Debtor.	2.00	300.00	600.00
04/23/24	Seaver, Randall L.	Prepare for and attend hearing.	0.80	550.00	440.00
04/23/24	Burton, Matthew R.	Telephone call with client and attend hearing; telephone call with Nathan Hansen.	0.80	525.00	420.00
05/10/24	Burton, Matthew R.	Work on scheduling hearing.	0.10	525.00	52.50
05/21/24	Kasheimer, Brandi J.	Review client notes and documents; search debtor's business entity; research business entity registered office address; prepare turnover motion.	1.50	180.00	270.00
05/21/24	Seaver, Randall L.	Review and compile documents. Prepare turnover draft.	1.00	550.00	550.00
05/28/24	Burton, Matthew R.	Telephone call with client regarding case needs.	0.20	525.00	105.00
05/31/24	Burton, Matthew R.	Work on subpoenas.	0.50	525.00	262.50

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06/05/24	Burton, Matthew R.	Work on discovery requests.	0.40	525.00	210.00
06/05/24	Kasheimer, Brandi J.	Review/modify subpoena to appear; prepare subpoenas to Walker & Walker and debtor for production of documents; email to client regarding same.	0.80	180.00	144.00
06/07/24	Kasheimer, Brandi J.	Review client notes and draft letter to N. Hansen regarding unsatisfied requests from debtor.	0.30	180.00	54.00
06/07/24	Kasheimer, Brandi J.	Review/edit letter to Walker & Walker; prepare acknowledgment of service; modify subpoenas and email to A. Walker.	0.20	180.00	36.00
06/10/24	Kasheimer, Brandi J.	Finalize letter to N. Hansen and email.	0.10	180.00	18.00
06/13/24	Burton, Matthew R.	Review new records from Debtor; telephone call with client and email to Hanson.	0.40	525.00	210.00
06/20/24	Kasheimer, Brandi J.	Prepare letter to N. Hansen regarding the \$8,000.81 transfer out of bank account.	0.20	180.00	36.00
06/20/24	Burton, Matthew R.	Review case issue with Attorney Seaver.	0.30	525.00	157.50
06/21/24	Burton, Matthew R.	Prepare for call with counsel for Walker and telephone call with client; confer with Susan Stokes and research on Westlaw.	0.80	525.00	420.00
06/28/24	Burton, Matthew R.	Review message from Susan Stokes regarding subpoena.	0.10	525.00	52.50
07/03/24	Burton, Matthew R.	Correspond with court regarding hearing and mediation.	0.20	525.00	105.00
07/08/24	Burton, Matthew R.	Correspond with Susan Stokes regarding subpoena.	0.10	525.00	52.50
07/10/24	Burton, Matthew R.	Review motions related to subpoena.	0.20	525.00	105.00
07/10/24	Kasheimer, Brandi J.	Review of filings by Walker & Walker; email to Walker's counsel S. Stokes requesting clarification on appearance requirements for hearing.	0.20	180.00	36.00
07/10/24	Muth, Rainey C.	Examine mediation efforts and documentation to date for purposes of preparing for upcoming hearing on the motion to quash subpoena.	1.00	300.00	300.00
07/11/24	Muth, Rainey C.	Research preference claim against unperfected liens on debtor's property; prepare adversary complaint against IRS.	2.30	300.00	690.00
07/12/24	Burton, Matthew R.	Confer with client and Rainey Muth regarding IRS complaint.	0.30	525.00	157.50

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07/12/24	Muth, Rainey C.	Research preference claims regarding unperfected liens; prepare adversary complaint against the IRS.	2.60	300.00	780.00
07/15/24	Burton, Matthew R.	Work on mediation statement and edit IRS complaint; respond to motion to quash.	2.20	525.00	1,155.00
07/15/24	Kasheimer, Brandi J.	Work on confidential mediation statement.	0.40	180.00	72.00
07/16/24	Kasheimer, Brandi J.	Prepare confidential mediation statement enclosures; finalize statement; coordinate delivery to US Bankruptcy Court.	0.20	180.00	36.00
07/17/24	Burton, Matthew R.	Work on subpoena objection response.	0.50	525.00	262.50
07/18/24	Muth, Rainey C.	Examine motions to quash subpoenas; prepare response to motion to quash subpoena; prepare for upcoming hearing regarding the same.	1.40	300.00	420.00
07/19/24	Burton, Matthew R.	Review and respond to Hansen email and converse with client regarding same.	0.50	525.00	262.50
07/22/24	Burton, Matthew R.	Work on IRS complaint; correspond with court and client regarding mediation.	1.30	525.00	682.50
07/23/24	Burton, Matthew R.	Prepare for and attend mediation; correspondence with Judge Fisher.	5.30	525.00	2,782.50
07/24/24	Burton, Matthew R.	Draft settlement agreement and circulate.	1.00	525.00	525.00
07/26/24	Burton, Matthew R.	Work on finalizing settlement.	0.20	525.00	105.00
07/30/24	Kasheimer, Brandi J.	Follow up with OC on settlement status.	0.10	180.00	18.00
07/31/24	Kasheimer, Brandi J.	Acknowledge receipt of executed Settlement Agreement from OC; review agreement and prepare motion for court approval.	0.50	180.00	90.00
08/07/24	Burton, Matthew R.	Work on finalizing settlement.	0.10	525.00	52.50
08/28/24	Kasheimer, Brandi J.	Receipt of settlement payment; email to client and Debtor's attorney regarding the same.	0.10	180.00	18.00
01/07/25	Kasheimer, Brandi J.	Review file and prepare final fee application; request account statement and prepare exhibits.	1.00	180.00	180.00
01/07/25	Burton, Matthew R.	Work on final fee app.	0.50	525.00	262.50
<b>Total</b>			<b>93.00</b>		<b>\$38,539.00</b>

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**Disbursements**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/19/23	VERITEXT CORP - Cash Disbursement - Transcript of 341 meeting	222.00
12/20/23	Computer Name Search	304.06
01/24/24	Postage expense re 2024-01-23 MRB Ltr to Debtor and Counsel serving Motion to Compel (\$2.11 x 3 mailings)	6.33
01/30/24	VERITEXT CORP - Cash Disbursement - Transcript of continued 341 meeting	150.00
02/06/24	Postage expense re 2024-02-05 MRB Ltr to Interested Parties serving Motion for Examination of Entities (\$2.35 x 3 mailings)	7.05
02/06/24	Postage expense re 2024-02-06 MRB Ltr to USPS serving Turnover Motion (\$.64 x 3 standard mailings and \$8.93 x 3 certified mailings)	28.71
02/06/24	Postage expense re 2024-02-06 MRB Ltr to Anytime Mailbox serving Turnover Motion (\$.88 x 1 mailing)	0.88
02/23/24	Postage expense re 2024-02-20 MRB Ltr to Debtor and Counsel serving Memorandum in Support of (\$1.87 x 4 mailings)	7.48
02/23/24	Postage expense re 2024-02-23 MRB Ltr to USPS reserving Turnover Motion (\$.64 x 1 standard mailings and \$8.93 x 1 certified mailings)	9.57
03/04/24	Orbit Systems and Solutions - Cash Disbursement - Image	7.00
03/05/24	Orbit Systems and Solutions - Cash Disbursement - Image	2.00
03/05/24	Orbit Systems and Solutions - Cash Disbursement - Cert of title	10.00
04/09/24	\$32.90- Postage expense re 2024-04-09 MRB Ltr to Interested Parties serving Motion Objecting to a Claimed Exemption (\$8.00 x 2 MN mailings and \$8.45 x 2 NM mailings)	32.90
<b>Total</b>		<b>\$787.98</b>